

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Feb 01, 2023

SEAN F. MCAVOY, CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAYLOR THOMAS RAYNE

SINCLAIR,

Defendant.

No. 1:22-CR-02112-SAB-1

**ORDER GRANTING THE UNITED
STATES' UNOPPOSED MOTION FOR
DISCOVERY PROTECTIVE ORDER**

Before the Court is the United States' Unopposed Motion for Discovery Protective Order, ECF No. 28. Defendant is represented by Andrea George and Juliana Van Wingerden. The United States is represented by Michael Murphy.

The United States seeks, pursuant to Fed. R. Cr. P. 16(d)(1), a Protective Order that contains protections against dissemination of the discovery materials. The United States indicates that Defense Counsel has reviewed the motion and they are in agreement with the issuance of the requested Protective Order. Good cause exists to grant the motion.

Accordingly, **IT IS ORDERED:**

1. The United States' Unopposed Motion for Discovery Protective Order, ECF No. 28, is **GRANTED**.

2. Pursuant to the discovery obligations previously imposed by the Court, the United States is authorized to disclose discovery in its possession and any Protected Information contained therein. As used herein, "Protected Information" means sensitive personal, business, and financial information of defendants and third parties, including for

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DISCOVERY PROTECTIVE ORDER ~1**

1 example, social security numbers, driver's license and identification information, taxpayer
2 identification numbers, tax information and records, salary information, dates of birth,
3 birth places, addresses, phone numbers, e-mail addresses, personal photographs,
4 cooperating witness information, minor witness information, and financial and business
5 account numbers and information.

6 3. Counsel for Defendant (hereinafter "Defense Counsel") shall not share or
7 provide any discovery items produced by the United States in this case with anyone other
8 than designated Defense Counsel, defense investigators, retained expert witnesses, and
9 support staff. Defense Counsel may permit their respective Defendant to view unredacted
10 discovery items in the presence of Defense Counsel, defense investigators, and support
11 staff. Defense Counsel personally, or through Defense Counsel's investigators and support
12 staff, may show unredacted discovery items to witnesses in regard to items or events about
13 which a witness may have personal knowledge. Defense Counsel and his investigators and
14 support staff shall not allow Defendant or witnesses to copy Protected Information
15 contained in the discovery.

16 4. The discovery and information therein may be used only in connection with
17 the litigation of this case and for no other purpose. The discovery is now and will forever
18 remain the property of the United States. At the conclusion of the case, Defense Counsel
19 will return the discovery to the United States, will certify that it has been shredded, or, if
20 the materials are still needed, will store it in a secure place and not disclose it to third
21 parties. If the assigned Defense Counsel is relieved or substituted from the case, Defense
22 Counsel will return the discovery to the United States or certify that it has been shredded.

23 5. Defense Counsel shall store the discovery in a secure place and will use
24 reasonable care to ensure that it is not disclosed to third persons contrary to the Protective
25 Order.

26 6. Defense Counsel shall be responsible for advising Defendant, employees,
27 witnesses, and other members of the defense team of the contents of this Protective Order.

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1 7. This Protective Order shall also apply to any new Defense Counsel that may
2 later become counsel of record in this case.

3 **IT IS SO ORDERED.** The District Court Executive is directed to file this Order
4 and provide copies to counsel.

5 **DATED** this 1st day of February 2023.



10 *Stanley A. Bastian*

11 Stanley A. Bastian
12 Chief United States District Judge
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